DECLARATION

SITE NAME AND LOCATION

Site Installation Restoration Program (IRP)-3, Paint Stripper Disposal Area – Operable Unit (OU)-1B

Site IRP-12, Drum Storage Area No. 2 – OU-1B

Former Marine Corps Air Station (MCAS) Tustin
Orange County, California

National Superfund Database Identification Number: CA9170090022

STATEMENT OF BASIS AND PURPOSE

This final Record of Decision (ROD)/Remedial Action Plan (RAP) presents the selected remedial action for groundwater at OU-1B Sites IRP-3 and IRP-12 at Former MCAS Tustin, located in Orange County, California.

This document was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (42 *United States Code* Section [§] 9602 et seq.) and in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (40 *Code of Federal Regulations* § 300 et seq.). The decision for these sites is based on information contained in the administrative record. A site-specific administrative record index for IRP-3 and IRP-12 is included as Attachment A.

The state of California (through the California Environmental Protection Agency Department of Toxic Substances Control [DTSC] and the Regional Water Quality Control Board Santa Ana Region) and the United States Environmental Protection Agency concur on the selected remedy.

REMEDIAL ACTION PLAN

This ROD/RAP satisfies the DTSC requirements for a RAP for hazardous substance release sites pursuant to *California Health and Safety Code* § 25356.1. The RAP requirements are summarized in Attachment C.

ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from groundwater at IRP-3 and IRP-12, if not addressed by implementing the remedial action selected in this ROD/RAP, may present a potential threat to public health and welfare or to the environment.

DESCRIPTION OF THE REMEDY

The impacted medium at IRP-3 and IRP-12 is groundwater. The chemicals of concern (COCs) in groundwater are volatile organic compounds (VOCs), which are present in separate groundwater plumes originating at each of the sites. Although these plumes are

not commingled, the sites are being addressed together in one OU because they share the same type of contamination and the remedy for both sites is the same.

Risks due to contaminated soil at IRP-3 and IRP-12 were evaluated during the remedial investigation and feasibility study. The feasibility study recommended no further action for soil at IRP-3 and IRP-12, since the contaminated soil does not pose a significant risk to human health and the environment. However, limited soil removal would further enhance contaminant mass removal, lessen the time needed to achieve remedial action objectives, and remove a potential continuing source of trichloroethene to groundwater resulting in concentrations exceeding the maximum contaminant level. Therefore, the selected remedy includes excavation and off-site disposal of soil hot spots (the most highly contaminated source areas). The selected remedy for groundwater at IRP-3 and IRP-12 includes:

- construction, operation, and maintenance of a groundwater extraction and treatment system to reduce elevated (i.e., hot spot) concentrations of VOCs in groundwater and to prevent or limit VOC migration beyond the current OU-1B plume boundaries (stabilize the plumes);
- groundwater extraction using extraction wells located in the hot spot areas of the plumes and hydraulic containment wells located on the margins of each of the plumes;
- treatment of extracted groundwater and either discharge of the treated groundwater to a nearby storm drain or disposal by another method based on a reevaluation of disposal options to be conducted during the remedial design phase;
- excavation and off-site disposal of VOC-contaminated soil to reduce the amount of this material, which could potentially act as an ongoing source of residual contamination to groundwater;
- performance monitoring throughout the remedial action;
- confirmatory groundwater sampling at the end of the remedial action to confirm that VOC concentrations have met remediation goals;
- protection of the integrity of groundwater extraction wells and remediation equipment;
- prevention of inadvertent use of or exposure to contaminated groundwater; and
- allowing the Department of the Navy (DON), DON contractors, and regulatory personnel access to install, operate, and maintain remediation equipment and to monitor the remedial action.

Extracted groundwater will be pumped through a cartridge filtration system followed by two-stage granular activated carbon adsorption. When the activated carbon in a canister becomes saturated with VOCs and is no longer effective, it is replaced with new carbon. The saturated carbon is then returned to the manufacturer, where it is regenerated and the VOCs are destroyed. Contaminated soil that is excavated will be transported to a permitted off-site disposal facility. Clean fill will be used to backfill excavated areas.

The remedial action addresses the risk posed by VOC contamination (which has been characterized as the primary threat at these sites) by removing and permanently destroying the contaminants, thereby significantly reducing the toxicity, mobility, and volume of hazardous substances in soil and groundwater.

Institutional controls, in the form of lease restrictions (if the property is leased) or restrictive covenants (if the property is transferred by deed), will be used to protect the integrity of the groundwater extraction wells and remediation equipment. Institutional controls are also necessary to prevent inadvertent use of contaminated groundwater and to allow the DON, DON contractors, and regulatory personnel access to install, operate, and maintain equipment and to monitor the remedial action.

The proposed alternative in the Proposed Plan included thermal treatment and reuse of the soil for the soil disposal component. Since the Feasibility Study Report and Proposed Plan were issued, this approach has been determined to be infeasible, and off-site disposal has been included in the selected remedy. Section 12 provides the rationale for the change in the soil disposal component.

STATUTORY DETERMINATIONS

The selected remedy is protective of human health and the environment, complies with federal and state requirements that are applicable or relevant and appropriate to the remedial action, and is cost-effective. The selected remedy uses permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable and satisfies the statutory preference for remedies employing treatment that reduces toxicity, mobility, and/or volume as a principal element.

The effectiveness of the selected remedial action discussed in this ROD/RAP will be reviewed at a minimum of 5 years to assure that it continues to provide adequate protection of human health and the environment and is achieving remediation goals. Once remediation goals have been achieved, the 5-year review will no longer apply to this action because hazardous substances will not remain above human-health-based levels.

ROD DATA CERTIFICATION CHECKLIST

The following information is included in the Decision Summary:

- COCs and their respective concentrations (Section 5)
- baseline risk represented by the COCs (Section 7)
- remediation goals established for COCs and the basis for these goals (Section 8)
- how source materials constituting principal threats are addressed (Section 8)
- current and reasonably anticipated future land-use assumptions and current and potential future beneficial uses of groundwater used in the baseline risk assessment and ROD/RAP (Sections 6 and 7)

- estimated capital, annual operation and maintenance, and total present worth costs; discount rate; and the number of years over which the remedy cost estimates are projected (Section 10)
- key factors that led to selecting the remedy (Sections 8, 9, and 10)

Additional information can be found in the administrative record files for these sites.

Signature: _____ Date: 12/22/04

Mr. Jerry Dunaway
Base Realignment and Closure Environmental Coordinator
Former Marine Corps Air Station Tustin

Signature: _____ Date: 11/10/04

Mr. John E. Scandura, Chief
Southern California Operations
Office of Military Facilities
Department of Toxic Substances Control

Signature: _____ Date: November 4, 2004

Mr. Gerard Thibeault, Executive Officer
California Regional Water Quality Control Board Santa Ana Region